

EXHIBIT B

From: [Alex Kaufman](#)
To: [Kenneth McLellan](#)
Cc: [Keith Rousset](#)
Subject: Re: Garmashov v. USPA
Date: Tuesday, February 7, 2023 7:09:39 PM

We are glad to have the hearing with the court. I'd recommend looking at the definition of "execution". Again, we don't believe that any further rendition is needed as the court affirmed the agreement terms as they were unambiguous.

We will be seeking fees from your firm and your client for these unnecessary and additional costs. Please put your partners and carrier on notice.

Alex B. Kaufman, Esq.

Member

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On Feb 7, 2023, at 4:50 PM, Kenneth McLellan <mclellan.k@wssllp.com> wrote:

Alex-

We have sent the agreement with language acceptable to our client, the USPA, signed. That agreement contains language that addresses the issue of a release and addresses confidentiality. These are terms that you included in your term sheet that you relied on to file a motion to enforce the settlement.

Your client has refused to sign this agreement.

Our client wishes to finalize the settlement, comply with the Court order and properly protect its interests.

It's unfortunate that we can't seem to work out the issues on our own. We are going to request Court intervention at this point.

We remain open to discuss finalizing the agreement, but, as noted, at this point, are contacting the Court.

Thank you.

-Ken

Very truly yours,

Kenneth A. McLellan
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From: Alex Kaufman <akaufman@chalmersadams.com>

Sent: Tuesday, February 7, 2023 11:41 AM

To: Kenneth McLellan <mclellan.k@wssllp.com>

Cc: Keith Roussel <roussel.k@wssllp.com>

Subject: Re: Garmashov v. USPA

Kenneth-

Is your client signing the version we sent you- i.e. without your recent attempted additions of a California release and the motion to revise the court's published order?

Alex B. Kaufman, Esq.

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